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March 7, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



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Re: Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-Based 800 MHz Specialized Mobile Radio Licenses, WT Docket No. 11-110; Notice of Ex Parte Presentation

Dear Ms. Dortch:

On March 5, 2012, David Rines of Fish & Richardson P.C., Counsel for Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) met with Linda Chang and Brian Regan of the Wireless Telecommunications Bureau and David Furth and Brian Marengo of the Public Safety and Homeland Security Bureau. Participating in the meeting by conference call were Michael Rosenthal, Holly Henderson, and Alan McIntyre of SouthernLINC Wireless.

The purpose of this meeting was to discuss Sprint Nextel’s pending Petition to authorize wideband operations in the 800 MHz Enhanced Specialized Mobile Radio (“ESMR”) Service band.¹ SouthernLINC Wireless understands that an item regarding the issues raised in the Sprint Nextel Petition has been placed in circulation at the Commission as captioned above.

In this meeting, SouthernLINC Wireless urged the Commission to take prompt action to allow licensees in the ESMR band to deploy and operate technologies that require channels greater than 25 kHz bandwidth on the 800 MHz spectrum authorized by their Economic Area (“EA”) licenses. SouthernLINC Wireless summarized its position, set forth in detail in its public filings in response to the Sprint Nextel

¹ / See “Wireless Telecommunications Bureau Seeks Comment on Petition From Sprint Nextel to Allow Wideband Operations In 800 MHz Enhanced Specialized Mobile Radio Service Bands,” WT Docket No. 11-110, Public Notice, DA 11-1152 (rel. June 30, 2011).

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Petition, that such wideband operations would be consistent with the Commission's current Part 90 rules.²

SouthernLINC Wireless explained that mobile wireless broadband technologies require the use of wider channels than the 25 kHz channels currently used in the 800 MHz ESMR band. For example, the use of LTE to provide mobile broadband services would require a minimum channel width of 1.4 MHz, with incrementally wider channels possible of 3, 5, and 10 MHz. SouthernLINC Wireless informed the Commission that on March 1, 2012, 3GPP approved specifications for the use of LTE in Band 26, which includes the 800 MHz ESMR band.

SouthernLINC Wireless also described how the current restrictions on out of band emissions in the "outer channels" of an ESMR licensee's spectrum (as set forth in Section 90.691 of the Commission's Rules) would permit the use of wider channels while ensuring sufficient protection for licensees in adjacent bands, including public safety licensees.

SouthernLINC Wireless explained that wideband operations in the 800 MHz ESMR band would effectively make this band available for the provision of mobile wireless broadband services, thus furthering several of the Commission's leading policy objectives such as encouraging investment in broadband networks and infrastructure, increasing broadband deployment and availability, promoting competition, and promoting the efficient use of spectrum. SouthernLINC Wireless emphasized, however, the pressing and urgent need for the Commission to provide regulatory certainty regarding wideband 800 MHz ESMR operations in order for these benefits to be realized.

In accordance with the Commission's rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of the above-captioned proceeding.

² / Comments of SouthernLINC Wireless in WT Docket No. 11-110 (filed Aug. 1, 2011); Reply Comments of SouthernLINC Wireless in WT Docket No. 11-110 (filed Aug. 16, 2011).

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If you should have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

/s/ David D. Rines

David D. Rines

Counsel for SouthernLINC Wireless

cc: Linda Chang
Brian Regan
David Furth
Brian Marengo